

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**RAS Crane LLC**

Attorneys for Secured Creditor

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In Re:

**Kurt N Kvist,**

**Debtor.**

Case No.: 19-21587-MBK

Chapter: 13

Hearing Date: June 2, 2020

Judge: Michael B. Kaplan

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

The within Notice of Motion requests relief from the automatic stay on the grounds set forth in the accompanying certification, that Debtor has failed to maintain monthly mortgage payments to the Secured Creditor.

As the facts which Secured Creditor relies upon, set forth in the accompanying Certification, and the basis for this motion do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: May 11, 2020

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19-278962

Notice of Motion